

Internal Revenue Service

Department of the Treasury

Refer Reply to:

Group:

Person to Contact:

Employee Identification Number:

Contact Telephone Number:

Date:

Dear

On May 5, 2004, the Internal Revenue Service issued Announcement 2004-46 which provides taxpayers an opportunity to resolve their tax liabilities associated with transactions described in Notice 2000-44 ("Son of Boss"). We have enclosed a copy of Announcement 2004-46, which provides details on the settlement initiative. We have also enclosed a Notice of Election form to elect participation in the settlement.

To elect to participate, you must send written notice to the IRS on or before June 21, 2004. Complete the enclosed form and return it to the addresses indicated on the form. Please note in Section 4 that the election is prepared under penalties of perjury.

After reviewing your election, we will notify you of your eligibility to participate. If you are eligible to participate, we will ask you to provide additional information and documentation relating to the Son of Boss transaction. You must submit the additional information within 60 days of the date we mail the notification of eligibility to you. Settlement under this initiative will be pursuant to a Form 906, *Closing Agreement on Final Determination Covering Specific Matters*.

You can find more information about Announcement 2004-46, including frequently asked questions on our web site at <http://www.irs.gov>.

Please call us at the contact number provided at the top of this letter if you have questions.

Sincerely yours,

Revenue Agent

Enclosures (2)